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REMARKS

This Application has been carefully reviewed in light of the Office Action mailed October 21, 2005. As described below, Applicant believes all claims to be allowable over the cited reference. Therefore, Applicant respectfully requests reconsideration and allowance of all pending claims.

Allowable Subject Matter

Applicant appreciates the Examiner's indication that Claims 15 and 34 would be allowable if rewritten in independent form including all limitations of the base claim and any intervening claims. However, Applicant believes that the independent claims as currently amended are in condition for allowance.

Section 103 Rejections

Claims 1-5, 7-9, 12-14, 16-33, and 35-60 are rejected under 35 U.S.C. §103(a) as being unpatenable over U.S. Patent No. 6,275,574 issued to Oran ("*Oran*") in view of view of U.S. Patent No. 4,757,267 issued to Riskin ("*Riskin*").

Applicant previously amended independent Claims 1, 28, 45, and 53 of the application to include the limitations of claims that the Examiner previously indicated were in condition for allowance. Because Applicant did not and does not think these added limitations are necessary for patentability and because the Examiner now indicates that these limitations are no longer allowable, Applicant has removed these limitations from independent Claims 1, 28, 45, and 53. These limitations have been returned to dependent claims as new Claims 61-63.

In the Office Action, the Examiner indicates that all of the remaining limitations in Claims 1, 28, 45, and 53 are found in *Oran*. However, as previously argued by the Applicant, *Oran* does not disclose each and every one of these limitations (and *Riskin* also does not disclose these limitations).

For example, *Oran* it does not disclose, teach, or suggest "accessing a dialing partition table based on a partition search space associated with the first device." The Examiner states

that dialing partitions and partition search spaces are disclosed in *Oran* in Figures 2A and 3 (item 32) and at Column 5, lines 40-50. Applicant respectfully disagrees that these portions of *Oran* (or any other portions of *Oran*) disclose, teach, or suggest a dialing partition table or a partition search space associated with a particular device.

The Examiner appears to be equating the database 32 of *Oran* as providing a disclosure of both the dialing partition table and the partition search space; however, it discloses neither. *Oran* describes the use of database 32 as follows:

> Referring to FIGS. 2A or 2B, the dial plan mapper 20 in the gateways 18 or 28 or gatekeeper 26 includes a database 32 storing configuration entries 33 that include regular expression match patterns and associated configuration information. Examples of the regular expression match patterns are shown below in FIG. 8. Examples of the associated configuration information is described in further detail below and shown in FIG. 7.
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> The dial plan mapper 20 receives an input dial scheme 35 from the session application 34 that includes an input dial string. The regular expression match patterns in database 32 are compared with the input dial string. The match pattern 39 that matches the longest string of digits in the input dial string is identified. The configuration information 41 associated with the longest identified match pattern 39 is used by the dial plan mapper 20 to generate an output dial scheme 37 that is sent back to the session application 34.
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> . . .
>
> The dial plan mapper queries the configuration database 32 for the longest match 44. The match pattern 44 with the longest match is used as an index to identify associated configuration information 46. The session application 34 uses the returned session protocol, and session target from the configuration information 46 to initiate a session with a destination for the presented dial string 42, such as phone 15 on IP network 22.

(*Oran*, Col. 3, lines 47-64; Col. 4, lines 58-61). Furthermore, the Examiner points to the following passage of *Oran*:

> Any digit string beginning with a "9" goes to the "best" PBX for reaching that PSTN number. The "best" PBX is determined as the PBX for site A when the area code is 408, and determined as the PBX at site B when the area code is 919. Otherwise, if the calling extension begins with the digit "6" the PBX for site A is used. If the call extension begins with the digit "2" the PBX at site B is used. If the call extension begins with the digit "7", either PBX is used. A bare digit "0" goes to the PBX operator station for the "default" PBX and anything else generates an error.

(*Oran*, Col. 5, lines 41-50). It is clear from these passages that *Oran* does not disclose dialing partition tables or partition search spaces. Instead, *Oran* discloses that for any input dial string, the dial plan mapper accesses a single database (database 32) and attempts to match the input dial string with match patterns in the database to determine how to handle the call (for example, to generate an output dial scheme). For example, as disclosed a Column 5, lines 41-50, a first digit or set of digits in an input dial string may determine the proper PBX to which the call should be directed. There is simply no disclosure of any dialing partition tables or partition search spaces, as evidenced by the fact that a single database 32 is used in an attempt to find the closest matching match pattern for all input dial strings.

To assist the Examiner in understanding the claim terminology, Applicant again directs the Examiner to pages 61-74 and Figures 14-16 of the Application, which contain a description of particular embodiments of dialing partition tables or partition search spaces. As an example only, the Application describes dialing partition tables or partition search spaces as follows:

> Each device 22, 24 is assigned a partition search space that includes the names of one or more of these dialing partitions. A telephony device 22, 54, 68 having a particular telephone number may be called only if the partition search space of the calling device 22, 24 contains a dialing partition that includes the telephone number. The dialing partition(s) in which the telephone number is included associates a routing target with the telephone number indicating a destination to which the call request should be communicated. When a device 22, 24 communicates a call request to a call manager 26, the digit analysis module 104 of the call manager 26 attempts to determine the routing target associated with the telephone number in the call request by searching in the dialing partitions that are listed in the partition search space of the calling device 22, 24.

(Application, Page 61, line 20 – Page 62, line 3). Applicant respectfully submits that there is no disclosure in *Oran* of the claimed dialing partition tables or partition search spaces. More specifically, there is no disclosure in *Oran* that telephone numbers are included in dialing partition tables (i.e., there is no disclosure of "determining a routing target associated with one or more telephone numbers in a dialing partition table that match the telephone number in the call request"). Furthermore, there is no disclosure in *Oran* that a device (such as the claimed first telephony device) has an associated partition search space and that a dialing

partition table is accessed based on the partition search space of the device from which a call request is received.

For at least these reasons, Claims 1, 28, 45, and 53, as well as the claims that depend from these independent claims, are in condition for allowance. Therefore, Applicant respectfully requests reconsideration and allowance of these claims.

In addition to be allowable for depending from an allowable independent claim, some or all of the dependent claims of the Application contain additional limitations that are also not disclosed in *Oran*. As examples only, several of these claims are discussed below.

For example, Claim 12 recites "creating a first dialing partition table including one or more telephone numbers associated with a first organization sharing the packet-based network with a second organization; and creating a second dialing partition table including one or more telephone numbers associated with the second organization." Claim 13 further recites "assigning the first dialing partition table to the partition search space of telephony devices associated with the first organization; and assigning the second dialing partition table to the partition search space of telephony devices associated with the second organization." Applicant submits that *Oran* does not disclose these limitations. The Examiner previously referred to Figure 5 (items 62 and 64) and Column 5, lines 41-51 of *Oran* to teach these limitations. However, there is no disclosure in *Oran* that the PBXs (items 62 and 64) at different sites are associated with *different organizations*, and there certainly is not a teaching of placing telephone numbers of different organizations in different dialing partition tables or putting these dialing partition tables in different partition search spaces associated with each organization. Column 5, lines 41-51 also does not disclose any of these limitations.

Furthermore, Claim 14 recites "associating the dialing partition tables with an identifier of each device, such that devices having different identifiers but sharing a line appearance may have different partition search spaces." Moreover, Claim 16 recites "accessing one or more dialing partition tables based on a partition search space received from the first device with the call request." The Office Action provides no guidance as to where these limitations might be found in *Oran*. Applicant submits that *Oran* clearly does

not disclose these limitations.

For at least these additional reasons, Claims 12-14 and 16 are allowable over *Oran*. In addition, although not argued, several other dependent claims also contain additional limitations not disclosed in *Oran*. Favorable action is respectfully requested.
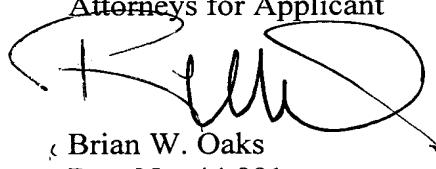
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CONCLUSION

Applicant has made an earnest attempt to place this case in condition for allowance. For the foregoing reasons, and for other reasons clearly apparent, Applicant respectfully requests full allowance of all pending claims.

If the Examiner feels that a telephone conference would advance prosecution of this Application in any manner, the Examiner is invited to contact Brian W. Oaks, Attorney for Applicant, at the Examiner's convenience at (214) 953-6986.

Although no fees are believed due, the Commissioner is hereby authorized to charge any fees or credit any overpayment to Deposit Account No. 02-0384 of Baker Botts L.L.P.

Respectfully submitted,

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